

Joseph F. Postnikoff  
State Bar No. 16168320  
GOODRICH POSTNIKOFF &  
ALBERTSON, LLP  
777 Main Street, Suite 1360  
Fort Worth, Texas 76102  
Telephone: 817.347.5261  
Telecopy: 817.335.9411

PROPOSED COUNSEL FOR THE DEBTOR IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§	Chapter 11
	§	
1300 CAMPBELL, L.P.,	§	Case No. 09-36300-SGJ-11
	§	
Debtor.	§	

**MOTION FOR EXPEDITED HEARING ON MOTION FOR (1) PRELIMINARY  
AND CONTINUING AUTHORITY TO USE CASH COLLATERAL,  
(2) AUTHORITY TO MAKE ADEQUATE PROTECTION PAYMENTS,  
(3) SUSPEND HOLDOVER RENT PROVISIONS UNDER COMMERCIAL LEASE  
AGREEMENT, AND (4) FOR RELATED RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

1300 Campbell, L.P. ("Debtor") hereby requests expedited consideration of its Motion for (1) Preliminary and Continuing Authority to Use Cash Collateral, (2) Authority to Make Adequate Protection Payments, (3) Suspend Holdover Rent Provisions Under Commercial Lease Agreement, and (4) for Related Relief (the "Motion").

Expedited consideration of the Motion is vital to the continued operation of the business of the Debtor as well as preservation of value of the estate of the Debtor. If certain of the requested relief is not granted prior to October 1, 2009, Debtor risks loss of the tenant of the subject Property.

**WHEREFORE, PREMISES CONSIDERED,** Debtor respectfully prays that the Court

grant this request and set the Motion for emergency hearing on or before September 30, 2009 at a time the Court deems appropriate and for such other and further relief, at law or in equity, to which Debtor may be shown justly entitled.

Dated this the 25<sup>th</sup> day of September, 2009.

Respectfully submitted,

GOODRICH POSTNIKOFF &  
ALBERTSON, LLP  
777 Main Street, Suite 1360  
Fort Worth, Texas 76102  
Telephone: 817.347.5261  
Telecopy: 817.335.9411

By: /s/ Joseph F. Postnikoff

Joseph F. Postnikoff  
State Bar No. 16168320

PROPOSED COUNSEL FOR DEBTOR IN  
POSSESSION

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I have attempted to confer with F. Beth Morgan, counsel for GE, regarding this Motion but did not receive a reply prior to the time of filing. It is presumed the Motion is opposed.

/s/ Joseph F. Postnikoff

Joseph F. Postnikoff

---

**In re 1300 Campbell, L.P.**

**Motion for Expedited Hearing on Motion for (1) Preliminary and Continuing Authority to Use Cash Collateral, (2) Authority to Make Adequate Protection Payments, (3) Suspend Holdover Rent Provisions Under Commercial Lease Agreement and (4) for Related Relief - Page 2**